

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

WSOU INVESTMENTS, LLC d/b/a BRAZOS LICENSING AND DEVELOPMENT,  <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p style="text-align: center;">GOOGLE LLC,</p> <p style="text-align: center;">Defendant.</p>	Case No. 6:20-cv-00571-ADA Case No. 6:20-cv-00572-ADA Case No. 6:20-cv-00573-ADA Case No. 6:20-cv-00574-ADA Case No. 6:20-cv-00575-ADA Case No. 6:20-cv-00576-ADA Case No. 6:20-cv-00577-ADA Case No. 6:20-cv-00578-ADA Case No. 6:20-cv-00579-ADA Case No. 6:20-cv-00580-ADA Case No. 6:20-cv-00581-ADA Case No. 6:20-cv-00582-ADA Case No. 6:20-cv-00583-ADA Case No. 6:20-cv-00584-ADA Case No. 6:20-cv-00585-ADA  <p style="text-align: center;"><b>JURY TRIAL DEMANDED</b></p>
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**JOINT CASE READINESS STATUS REPORT**

**TO THE HONORABLE COURT:**

Plaintiff WSOU Investments, LLC and Defendant Google LLC, hereby provide the following status report in advance of the initial Case Management Conference (CMC).

**FILING AND EXTENSIONS**

Plaintiff WSOU filed a complaint in each of the above-numbered cases on June 29, 2020. There has been one extension for a total of 45 days in all cases except in *WSOU Investments LLC v. Google LLC*, No. 6:20-cv-00571; in that case, there were two extensions for a total of 45 days; a first extension for 45 days, and a second extension after WSOU filed a first amended complaint on August 5, 2020, covering the same period and ensuring that Google's Rule 12 responses all fell on the same day.

**RESPONSES TO THE COMPLAINTS**

Defendant filed an answer in the following cases on September 11, 2020: -00571, -00572, -00573, -00574, -00576, -00578, -00579, -00581, -00582, -00583, and -00584.

**PENDING MOTIONS**

Defendant filed a motion to dismiss pursuant to Rule 12(b)(6) in the following cases on September 11, 2020: -00575, -00577, -00580, and -00585. There are no other pending motions.

**RELATED CASES IN THIS JUDICIAL DISTRICT**

The above-numbered cases were all filed by Plaintiff against Defendant in this District. There are no known related cases.

**IPR, CBM, AND OTHER PGR FILINGS**

There are no known IPR, CBM, or other PGR filings with respect to the patents asserted in the above-numbered cases.

**NUMBER OF ASSERTED PATENTS AND CLAIMS**

Based on the current understanding of Defendant's products, Plaintiff intends to assert in the infringement contentions the following number of claims:

Case	Number of Patents	Number of Claims
-00571	1	9
-00572	1	14
-00573	1	5
-00574	1	21
-00575	1	12
-00576	1	7
-00577	1	20
-00578	1	4

-00579	1	26
-00580	1	41
-00581	1	12
-00582	1	4
-00583	1	5
-00584	1	5
-00585	1	6

### **APPOINTMENT OF TECHNICAL ADVISOR**

The parties are discussing whether appointment of a technical adviser would be beneficial and will so advise the Court in the coming weeks.

### **MEET AND CONFER STATUS**

The parties raise the following pre-*Markman* issues:

***Conduct of Markman Hearing*** – the parties understand that the Court has scheduled these cases for *Markman* on March 25-26, 2021. The parties are meeting and conferring and will make a proposal to the Court for orderly presentation of the claim construction issues presented in the above-numbered cases over the two days allocated for hearing.

***Protective Order*** – the parties anticipate submitting a proposed form of protective/confidentiality order, or their limited disputes regarding such an order, in the coming days.

Date: October 2, 2020

Respectfully submitted,

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